

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HERTZ GLOBAL HOLDINGS, INC.,

Plaintiff,

vs.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH and U.S.
SPECIALTY INSURANCE COMPANY,

Defendants.

Nos. 1: 19-cv-06957 (AJN)

**PLAINTIFF'S NOTICE OF MOTION
FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the legal memoranda and other papers noted therein and/or attached thereto, and all prior papers and proceedings had herein, and any other matter that the Court may determine to be just and proper, Plaintiff Hertz Global Holdings, Inc. hereby moves this Court, by and through its undersigned attorneys, pursuant to Rule 15 of the Federal Rules of Civil Procedure, on a date and time to be set by the Court, for an order granting Plaintiff leave to file a Second Amended Complaint in the captioned action, and granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York
May 19, 2020

LAW OFFICE OF ROBERT R. VIDUCICH

By: /s/ Robert Vidulich
Robert R. Vidulich
40 Wall Street, 28th Floor
New York, New York 10005
Tel.: (212) 400-7135
rvidulich@rrvlaw.com

-and-

Herbert Beigel
LAW OFFICES OF HERBERT BEIGEL
5641 N. Chieftan Trail
Tucson, Arizona 85750
Tel.: (520) 825-1995
hbeigel@me.com

Attorneys for Plaintiff

TO: Alexander Lorenzo, Esq.
Joseph Bailey, Esq.
Attorneys for Defendants